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NOT ADMITTED IN D.C.

October 13, 1998

Ms. Magalie Roman Salas  
Secretary  
Federal Communications Commission  
Washington, D.C. 20554

Re: Amendment of Section 73.202(b)  
FM Table of Allotments  
(Mishicot, Wisconsin; Gulliver,  
Manistique and Rogers City, Michigan)  
RM-9336

Dear Ms. Salas:

Transmitted herewith on behalf of Bay-Lakes-Valley Broadcasters, Inc. is an original and four copies of its Response to Comments and Counterproposal of Ives Broadcasting, Inc. This response is respectfully directed to the Chief, Allocations Branch.

Should any questions arise concerning this matter, please contact this office directly.

Sincerely,

  
John F. Garziglia

Enclosure

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Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

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In the Matter of )  
 )  
Amendment of Section 73.202(b), ) RM-9336  
Table of Allotments, )  
FM Broadcast Stations. )  
(Mishicot, Wisconsin; Gulliver, )  
Manistique and Rogers City, Michigan) )

To: Chief, Allocations Branch

**RESPONSE TO COMMENTS AND COUNTERPROPOSAL  
OF IVES BROADCASTING, INC.**

Bay-Lakes-Valley Broadcasters, Inc., by its attorneys<sup>1/</sup>, hereby files its response to the September 29, 1998 Comments and Counterproposal submitted by Ives Broadcasting, Inc.

On June 26, 1998, Bay-Lakes-Valley Broadcasters, Inc. filed a Petition for Rule Making seeking an upgrade for WGBM(FM) from Channel 234A to Channel 234C3. In that Petition for Rule Making, Bay-Lake-Valley Broadcasters, Inc. proposed several related channel allotment modifications in order to accomplish the WGBM(FM) upgrade. Ives Broadcasting, Inc. proposes an alternate allotment scheme to achieve an upgrade of WGBM(FM), Mishicot, Wisconsin.

Bay-Lakes-Valley Broadcasters, Inc. supports the alternate scheme of allotments proposed by Ives Broadcasting, Inc. in its September 29, 1998 Comments and Counterproposal. Bay-Lakes-

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<sup>1/</sup> Pepper & Corazzini, L.L.P. hereby makes an appearance on behalf of Bay-Lakes-Valley Broadcasters, Inc. Pepper & Corazzini, L.L.P. should be served with all further pleadings and notices in this proceeding.

Valley Broadcasters, Inc. reaffirms its reimbursement commitment as stated in its June 26, 1998 Petition for Rule Making with respect to its upgrade being granted under the proposal of Ives Broadcasting, Inc. Further, Bay-Lakes-Valley Broadcasters, Inc. hereby re-affirms its certification that it will file an application to specify operation of WGBM(FM), Mishicot, Wisconsin on Channel 234C3 when Channel 234C3 is substituted for Channel 234A, and when authorized, promptly build the upgraded facilities and commence operation.

Respectfully submitted,

**BAY-LAKES-VALLEY BROADCASTERS, INC.**

By: \_\_\_\_\_

  
John F. Garziglia  
Its Attorney

Pepper & Corazzini, L.L.P.  
1776 K Street, N.W.  
Suite 200  
Washington, D.C. 20006  
(202) 296-0600

October 13, 1998

CERTIFICATE OF SERVICE

I, Tracey S. Westbrook, a secretary in the law firm of Pepper & Corazzini, L.L.P., do hereby certify that true copies of the foregoing "Response to Comments and Counterproposal of Ives Broadcasting, Inc." were sent this 13th day of October, 1998 by U.S. first class mail, postage prepaid, to the following:

Great Lakes Radio Incorporated  
101 Huron Court  
Negaunee, MI 49866  
(Licensee of WCMM(FM), Gulliver, Michigan)

Todd Stuart Noordyk  
101 Huron Court  
Negaunee, MI 49866  
(Applicant for Channel 260A at Manistique, Michigan)

Henry E. Crawford, Esquire  
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1150 Connecticut Avenue, N.W.  
Suite 900  
Washington, D.C. 20036  
(Counsel to Roy E. Henderson  
d/b/a Indian River Broadcasting Company)

Matthew H. McCormick, Esquire  
Reddy, Begley & McCormick  
2175 K Street, N.W.  
Suite 350  
Washington, D.C. 20037-1803  
(Counsel to Ives Broadcasting, Inc.)

  
Tracey S. Westbrook